1 Honorable John C. Coughenour 2 3 4 5 6 7 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 Lee Valley Tools Ltd., No. 2:22-cv-01023-JCC 10 Plaintiff, STIPULATED MOTION FOR 11 **EXTENSION OF TIME TO RESPOND** TO PLAINTIFF'S COMPLAINT VS. 12 Progressive International Corporation, 13 NOTE ON MOTION CALENDAR: Defendant. 8/12/2022 14 15 Plaintiff Lee Valley Tools Ltd. and Defendant Progressive International Corporation, by 16 and through their undersigned counsel of record, hereby stipulate and agree as follows: 17 1. The deadline for Defendant to respond to Plaintiff's Complaint is currently 18 August 17, 2022. 19 2. The parties are discussing a possible resolution of this lawsuit and agree that the 20 time for Defendant to respond to the Complaint should be extended by twenty-one days up to 21 and through September 7, 2022. 22 3. The parties respectfully request that the Court enter the below Order extending 23 the response deadline as stipulated. 24 // 25 // 26 // FOX ROTHSCHILD LLP STIPULATED MOTION FOR EXTENSION OF TIME 1001 FOURTH AVENUE, SUITE 4400 TO RESPOND TO PLAINTIFF'S COMPLAINT SEATTLE, WA 98154

206.624.3600

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2	IT IS SO STIPULATED.	
3	Dated: August 12, 2022	Dated: August 12, 2022
4	DORSEY & WHITNEY LLP	FOX ROTHSCHILD LLP
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6	/s/ Dylan Harlow Dylan Harlow, WSBA #58422 701 Fifth Avenue, Suite 6100	/s/ James E. Breitenbucher James E. Breitenbucher, WSBA #27670 1001 Fourth Avenue, Suite 4400
7 8	Seattle, WA 98104-7043 206-903-8800 Harlow.Dylan@Dorsey.com	Seattle, WA 98154 206-624-3600 jbreitenbucher@foxrothschild.com
9	Counsel for Plaintiff	Counsel for Defendant
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1 **ORDER** Based on the foregoing stipulation of the parties and good cause shown, IT IS 2 3 HEREBY ORDERED that the time for Defendant to respond to Plaintiff's Complaint is extended up to and through September 7, 2022. 4 DATED this 15th day of August 2022. 5 6 7 oh C Cogher 8 9 John C. Coughenour 10 UNITED STATES DISTRICT JUDGE 11 Presented by: 12 /s/ James E. Breitenbucher 13 James E. Breitenbucher, WSBA #27670 FOX ROTHSCHILD LLP 14 1001 Fourth Avenue, Suite 4400 Seattle, WA 98154 15 Telephone: 206.624.3600 16 Facsimile: 206.389.1708 jbreitenbucher@foxrothschild.com 17 Attorneys for Defendant Progressive 18 International Corporation 19 20 21 22 23 24 25 26 FOX ROTHSCHILD LLP STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT

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